

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT**

STACI SULLIVAN,)	
)	
PLAINTIFF,)	
)	
V.)	CASE NO: CV2010-494
)	
NELSON, WATSON &)	
ASSOCIATES, LLC)	
)	
DEFENDANT.)	
)	

NOTICE OF SERVICE OF DISCOVERY

PLEASE TAKE NOTICE that on the 14th day of January, 2011, Defendant, Nelson, Watson & Associates, LLC, served upon all counsel to these proceedings a copy of the following via e-file:

1. Defendant's Responses to Plaintiff's First Set of Interrogatories and Requests for Production.

Respectfully submitted,

/s/ Neal D. Moore, III
Neal D. Moore, III
Amy E. Blankenship
*Attorneys for Defendant Nelson Watson &
Associates, LLC*

OF COUNSEL:
FERGUSON, FROST & DODSON, LLP
2500 Acton Road, Suite 200
Birmingham, Alabama 35243
(205) 879-8722 – telephone
(205) 879-8831 – telecopier

CERTIFICATE OF SERVICE

This is to certify that on this the 14th day of January, 2011, a copy of the forgoing document has been served upon counsel for all parties to this proceeding by the following method:

_____ mailing the same by first-class United States mail,
properly addressed and postage pre-paid

_____ hand delivery

_____ via facsimile

 X E-File

Kenneth J. Riemer
Underwood & Riemer, PC
P.O. Box 1206
Mobile, Alabama 36635

/s/ Neal D. Moore, III

OF COUNSEL

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT**

STACI SULLIVAN,)	
)	
PLAINTIFF,)	
)	
V.)	CASE NO: CV2010-494
)	
NELSON, WATSON &)	
ASSOCIATES, LLC)	
)	
DEFENDANT.)	
)	

**DEFENDANT'S RESPONSES TO PLAINTIFF'S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION**

COMES NOW the Defendant, Nelson, Watson & Associates, LLC, and responds to the Plaintiff's First Set of Interrogatories and Requests for Production of Documents as follows:

INTERROGATORIES

1. Identify the names, addresses, and telephone numbers of all persons who supplied information responsive to these interrogatories.

RESPONSE:

Dan Kuzmitski

Nelson Watson & Associates, LLC

80 Merrimack St. Lower Level

Haverhill, MA 01830

Phone: (800) 388-1190

2. Identify each and every person whom you have reason to believe has knowledge of any of the facts, events, or matters that are alleged in the Complaint. For each person identified, describe and explain your understanding of the matters on which you believe the person has knowledge and state whether that person is a current employee of yours.

OBJECTION: Defendant objects to this request as overly broad and vague.

RESPONSE: Without waiving said objections, the Defendant states:

Dan Kuzmitski and the employees of Nelson Watson who collected the account

Staci Sullivan

Stephen Sullivan

The representative of Mrs. Sullivan's employer involved in her alleged reprimand

3. Identify all correspondence or communication between you and any other person relating or referring to the facts, acts, events, or matters alleged in the Complaint.

OBJECTION: Defendant objects to this request as overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and vague. Further Defendant objects to the extent this request seeks information protected by the attorney-client privilege or work product doctrine.

RESPONSE: Without waiving said objection, see account notes produced (NW 00001-4) and letters sent to Plaintiff on January 18, 2010 (NW 00005) and November 16, 2009 (NW 00006).

4. With respect to the Account, give the following information:

A. Original creditor;

B. Date on which the account was opened;

C. Last date any payment was made on the account;

D. Identify all documents relating to the account.

OBJECTION: Defendant objects to this request as overly broad and vague.

RESPONSE: Without waiving said objections, the original creditor was Capital One Services, LLC. The last payment was made on March 31, 2009. See account notes produced (NW 00001-4) and letters sent to the Plaintiff on January 18, 2010 (NW 00005) and November 16, 2009 (NW 00006).

5. Do you contend that Plaintiff owes a debt in connection with the Account? If your answer is "yes," state each and every fact that forms the basis for that contention and identify each and every document relating to such contention.

OBJECTION: Defendant objects to this request on the ground that it is overly broad and vague.

RESPONSE: Without waiving said objection, Defendant relies on the information received from Capital One regarding the authenticity and validity of the debt. The information from Capital One is reflected in the letters and account notes produced.

6. Describe in detail each and every action you took in an attempt to collect a debt against Plaintiff.

OBJECTION: Defendant objects to this request as overly broad, vague, and not reasonably calculated to lead to the discovery of admissible evidence.

RESPONSE: Subject to and without waiving said objections, see account notes produced (NW 00001-4) and letters sent to Plaintiff on January 18, 2010 (NW 00005) and November 16, 2009 (NW 00006).

7. Describe in detail each and every action you took against anyone other than Plaintiff in an attempt to collect a debt relating to the Account.

OBJECTION: Defendant objects to this request as overly broad, vague, and not reasonably calculated to lead to the discovery of admissible evidence. If the Plaintiff will clarify this question, the Defendant will endeavor to answer it.

8. Identify and list all correspondence or communication between you and any other person or entity relating or referring to the Account.

OBJECTION: Defendant objects to this request as overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Defendant also objects to this request to the extent it seeks information protected by attorney-client privilege or the work product doctrine.

RESPONSE: Without waiving said objections, see account notes produced (NW 00001-4) and letters sent to Plaintiff on January 18, 2010 (NW 00005) and November 16, 2009 (NW 00006).

9. Identify the entity from whom you obtained assignment of the Account, the date of the assignment and all documents and information provided to you by the assignee.

OBJECTION: Defendant objects to this request as overly broad, vague, and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent it seeks confidential, proprietary, and/or trade secret information.

RESPONSE: Without waiving said objections, this account was assigned by Capital One Services, LLC on November 13, 2009. Information about the account was provided by Capital One and is contained in the account notes.

10. Describe in detail each and every action you took in an attempt to collect the alleged debt relating to the Account. In your answer, give the dates of each correspondence mailed to Plaintiff and date of each collection call made.

OBJECTION: Defendant objects to this request as overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

RESPONSE: Without waiving said objection, see account notes produced (NW 00001-4) and letters sent to Plaintiff on January 18, 2010 (NW 00005) and November 16, 2009 (NW 00006).

11. Identify, by jurisdiction and case number, each and every lawsuit filed within the last fifteen (15) years in which it was alleged that you violated the Fair Debt Collections Practices Act. Your answer should include actions in which you were a defendant and, in the case of any counterclaim containing such allegations, actions in which you were a Plaintiff.

OBJECTION: Defendant objects to this request as overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Additionally, Defendant objects to this request as not reasonably limited temporally or geographically. Defendant further objects to this request as it seeks information that is public record and thus equally accessible to Plaintiff as it is to Defendant.

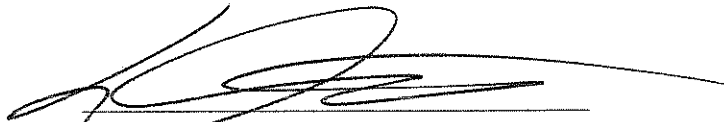
RESPONSE: Without waiving said objections, Defendant has a list of all lawsuits since January 2009, which is produced in the format in which it is maintained by Nelson Watson. See NW 00007-8. Information on suits filed prior to January 2009 is not readily available at Nelson Watson.

12. Have you recorded any telephone communications between you and Staci Sullivan? If your answer is "yes," provide the following information:

- a. Date and time of each recorded conversation;
- b. The person(s) who spoke with Murray during the recorded conversation;
- c. Description of the format in which the recorded conversation is maintained.

OBJECTION: Defendant objects to this request as overly broad, unduly burdensome, and vague. Defendant further objects on the basis that "Murray" is not a party to this case and has not been previously identified by the Plaintiff.

RESPONSE: Without waiving said objections, yes. The date and time of each recorded conversation is reflected in the account notes produced. The calls are formatted on CDs.



DAN KUZMITSKI

STATE OF MASSACHUSETTS

ESSEX COUNTY)

I, the undersigned authority, a Notary Public in and for said County in said State, hereby certify that DANIEL KUZMITSKI whose name as Dir of TRAINING & Comp. of Nelson Watson & Associates, a corporation, is signed to the foregoing document, and who is known to me, acknowledged before me on this day that, being informed of the contents of the document, he/she, as such officer and with full authority, executed the same voluntarily for and as the act of said corporation.

SWORN TO AND SUBSCRIBED before me on this 14th day of JANUARY, 2011.

Lisa J. McGillis
Notary Public

My Commission Expires: 10/20/2017
[SEAL]

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Each and every document involving or relating in any way to Plaintiff.

OBJECTION: Defendant objects to this request as it is overly broad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence. Further, Defendant objects to the extent this request seeks information protected by the attorney-client privilege or work product doctrine.

RESPONSE: Without waiving said objections, see account notes produced (NW 00001-4) and letters sent to Plaintiff on January 18, 2010 (NW 00005) and November 16, 2009 (NW 00006).

2. All documents identified or referred to in response to the foregoing interrogatories.

RESPONSE: See account notes produced (NW 00001-4) and letters sent to Plaintiff on January 18, 2010 (NW 00005) and November 16, 2009 (NW 00006).

3. All documents relating in any way to the Account.

OBJECTION: The Defendant objects to this request as overly broad and not reasonably calculated to lead to the discovery of admissible evidence, and vague. Further, this request is not reasonably limited in time or scope. Defendant also objects to the extent this request seeks information protected by attorney-client privilege or work product doctrine.

RESPONSE: Without waiving said objections, see account notes produced (NW 00001-4) and letters sent to Plaintiff on January 18, 2010 (NW 00005) and November 16, 2009 (NW 00006).

4. All documents referred to in compiling the responses to the foregoing interrogatories.

OBJECTION: Defendant objects to this request as overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to the extent this request seeks information protected by the attorney-client privilege or work product doctrine.

RESPONSE: Without waiving said objections, see account notes produced (NW 00001-4) and letters sent to Plaintiff on January 18, 2010 (NW 00005) and November 16, 2009 (NW 00006).

5. Each and every document involving communications or contacts between you and any other person or entity which in any way relates to Plaintiff or the Account.

OBJECTION: Defendant objects to this request as overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Defendant also objects to the extent this request seeks confidential, proprietary, and/or trade secret information. Defendant further objects to the extent this request seeks information protected by the attorney-client privilege or work product doctrine.

RESPONSE: Without waiving said objections, see account notes produced (NW 00001-4) and letters sent to Plaintiff on January 18, 2010 (NW 00005) and November 16, 2009 (NW 00006).

6. Any and all documents relating to any attempt by you or anyone acting on your behalf to collect sums you contend were owed to you by Plaintiff.

OBJECTION: Defendant objects to this request as overly broad. Defendant also objects to the extent this request seeks confidential, proprietary, and/or trade secret

information. Defendant further objects to the extent this request seeks information protected by the attorney-client privilege or work product doctrine.

RESPONSE: Without waiving said objections, see account notes produced (NW 00001-4) and letters sent to Plaintiff on January 18, 2010 (NW 00005) and November 16, 2009 (NW 00006).

7. Printouts of all of your computer screens showing any information which in any way relates to Plaintiff or the Account.

OBJECTION: Defendant objects to this request as overly broad. Defendant further objects to this request to the extent that it seeks confidential, proprietary, and/or trade secret information. Additionally, Defendant objects to the extent the information sought is protected by the attorney-client privilege or work product doctrine.

RESPONSE: Without waiving said objection, see account notes produced (NW 00001-4) and letters sent to Plaintiff on January 18, 2010 (NW 00005) and November 16, 2009 (NW 00006).

8. Statements of the policies, practices or procedures regarding the collection of debts in effect within the last two years preceding the filing of this action.

OBJECTION: Defendant objects to this request as overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request to the extent that it seeks confidential, proprietary, and/or trade secret information.

RESPONSE: Notwithstanding the foregoing and without waiver of same, Defendant will produce its policies during the relevant time period pursuant to an appropriate protective order.

Respectfully submitted,

/s/ Neal D. Moore, III

Neal D. Moore, III

Amy E. Blankenship

*Attorneys for Defendant Nelson Watson &
Associates, LLC*

OF COUNSEL:

FERGUSON, FROST & DODSON, LLP

2500 Acton Road, Suite 200

Birmingham, Alabama 35243

(205) 879-8722 – telephone

(205) 879-8831 – telecopier

CERTIFICATE OF SERVICE

This is to certify that on this the 14th day of January, 2011, a copy of the forgoing document has been served upon counsel for all parties to this proceeding by the following method:

_____ mailing the same by first-class United States mail,
properly addressed and postage pre-paid

_____ hand delivery

_____ via facsimile

 X E-File

Kenneth J. Riemer
Underwood & Riemer, PC
P.O. Box 1206
Mobile, Alabama 36635

/s/ Neal D. Moore, III
OF COUNSEL

Report Date: Wed 09-15-2010

Debtor Overview Report

Page 1 of 4

Name	Sullivan, Staci	Client	Capital One Services LLC - CT	Assigned	\$2,428.83
Add	6429 Pinehurst Run	Net	CORE TOP 20091113	Balance	\$2,812.78
CSZ	Mobile, AL 366083855	Type	CREDIT_CARD	Last Work	11-24-2009
Ssn	417-82-2505	Branch	Nelson, Watson & Associates	LPC Date	03-31-2009
Acct	454841230	Agency	Nelson Watson Haverhill	LPC Amt	\$50.00
Agy Id	CAPT10218	Desk	1140 Complaint Review	LPA Date	
DOA	Fri 11-06-2009	Section	Restricted	LPA Amt	\$0.00
DOR	Fri 11-13-2009	Status	On Notice	Canc Date	
Int	0.00%	Phase	CENTRAL	Sent Date	
Rmk:					

Initial Name	Type	Date Sent	Who Sent Letter
Initial Dunn	2	11/13/2009	SOUJY
SPECIAL DISCOUNT OFFER	11	01/15/2010	PECTEAU

Employee Name	Last Name	First Name	MI	Phone
OROURKE ELEMENTARY	SULLIVAN	STACI	O	
SULLIVAN S M				2512585132
STACI WITHERINGTON				3343437111
STACI WITHERINGTON				3343432010
STACI SULLIVAN				

Note Date	Time	Last Name	Note Text
Fri Nov 13, 2009	09:06:49	UTILITIES M	Debtor Credit Bureau Requested: 11/13/2009 09:06:36
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: SSN did not match SSA File
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Client input phone matched 1 File One Phone.
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: 2 File One Phones Appended.
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Deceased Indicator - N
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: BK Chapter 7 Disposition Indicator - D
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: BK Chapter 11 Disposition Indicator - N
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: BK Chapter 13 Disposition Indicator - N
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: SAT Judgements/Alens (12 mos) Indicator - N
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Total Derog Accts (Trade & Public Record) - 4
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Total Accts with 30 days past due in past 24 mos - 0
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Total Accts with 60 days past due in past 24 mos - 0
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Total Accts with 90 days past due in past 24 mos - 0
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Total Accts with 120 days past due in past 24 mos - 4
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Old Address : 6429 PINEHURST RUN MOBILE AL 366083855
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Debtor address has changed with the experian best address.
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Total Accts in Collection Status 0
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Total Accts w/Paid Collection Status in 6 months 0
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Total Monthly Payment Amt (All - 12 Months) 1864
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Sum of Credit Amt - Mortgages (12 months) 189,770
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Sum of Balance Amt - 1st Mortgages (12 months) 183,671
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Sum of Credit Amt - H-Equity/2nd MTG (12 mos) 0
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Sum of Balance Amt - H-Equity/2nd MTG (12 mos) 0
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Found Home Ownership
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Sum of Balance Amt - Installment Loans (12 mos) 12,540
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Sum of Credit Amt - Revolving Trades (12 mos) 9,690
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Sum of Balance Amt - Revolving Trades (12 mos) 11,331
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: % of Credit Utilization - Revolving Trades (12 mos) 0
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: % of Credit Utilization - Bankcard (12 mos) 0
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Sum of Available Credit Amt - Bankcard 0
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Sum of Balance Amt - Auto Loans (12 mos) 0

NW 00001

Note Date	Time	Last Name	Note Text
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: % of Credit Utilization - Auto Loans (12 mos) 0
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Sum of Balance Amt - Auto Leases (12 mos) 0
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: % of Credit Utilization - Auto Leases (12 mos) 0
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Total Accounts opened in past 6 mos 0
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Total Revolving Accts opened in past 3 mos 0
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Total Installment Loans Opened in past 3 mos 0
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Total Finance Accounts with Balance > 0 (12 mos) 0
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Total credit inquiries logged in past 3 mos 00
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Process: Total credit inquiries logged in past 6 mos 00
Fri Nov 13, 2009	09:07:48	GOOLEY JO	Experian Found Possible Banko
Fri Nov 13, 2009	09:22:47	SYSTEM TH	MOVED FROM 1100 TO NEWS12 SINCE ACCT OPENED AFTER BANKO DISCHARGE DATE
Fri Nov 13, 2009	10:41:44	SOUCY PA	Letter #2: Initial Dunn Sent to Sullivan, Glad 6429 PINEHURST RUN MOBILE AL
Fri Nov 13, 2009	10:41:44	SOUCY PA	368083855
Fri Nov 13, 2009	11:13:57	AGNEW AM	Phoned: STACI SULLIVAN at Home dialed: 2512595132
Fri Nov 13, 2009	11:13:59	AGNEW AM	Left Message on Recorder
Fri Nov 13, 2009	11:18:48	DIALER TH	Phoned: STACI SULLIVAN at Experian Phone dialed: 2513400159
Fri Nov 13, 2009	11:18:48	DIALER TH	Dialer Operator Intercept
Fri Nov 13, 2009	11:31:15	VALLIERE S	Phoned: STACI SULLIVAN at Experian Phone dialed: 2515333030
Fri Nov 13, 2009	11:31:16	VALLIERE S	Left Message on Recorder
Mon Nov 16, 2009	18:12:38	SYSTEM TH	ACCOLLAID -- New Contact Phone: 2512595132
Mon Nov 16, 2009	18:12:38	SYSTEM TH	ACCOLLAID -- New Contact Phone: 3343437111
Mon Nov 16, 2009	18:12:38	SYSTEM TH	ACCOLLAID -- New Contact Phone: 3343432010
Mon Nov 16, 2009	20:38:04	PHOENIX CI	Phoned: STACI SULLIVAN at Home dialed: 2512595132
Mon Nov 16, 2009	20:38:51	PHOENIX CI	No Answer, No Message Left
Tue Nov 17, 2009	09:33:20	LADD MI	Phoned: STACI SULLIVAN at Home dialed: 2512595132
Tue Nov 17, 2009	09:34:33	LADD MI	No Answer, No Message Left
Tue Nov 17, 2009	09:50:02	DOYLE ME	Phoned: STACI SULLIVAN at Experian Phone dialed: 2515333030
Tue Nov 17, 2009	09:50:05	DOYLE ME	Left Message on Recorder
Tue Nov 17, 2009	09:50:05	DOYLE ME	female voice on machine
Tue Nov 17, 2009	13:41:57	LAPEY DA	Phoned: STACI SULLIVAN at Home dialed: 2512595132
Tue Nov 17, 2009	13:42:02	LAPEY DA	*** STACI SULLIVAN Debtor record changed by: dlapay
Tue Nov 17, 2009	13:42:04	LAPEY DA	Left Message on Recorder
Wed Nov 18, 2009	17:52:50	LADD MI	Phoned: STACI SULLIVAN at Home dialed: 2512595132
Wed Nov 18, 2009	17:53:34	LADD MI	No Answer, No Message Left
Wed Nov 18, 2009	20:21:49	JOHNSON A	Phoned: STACI SULLIVAN at Experian Phone dialed: 2515333030
Wed Nov 18, 2009	20:21:57	JOHNSON A	Wrong Number
Thu Nov 19, 2009	09:13:11	FRANGEDAI	Phoned: STACI SULLIVAN at Home dialed: 2512595132
Thu Nov 19, 2009	09:13:12	FRANGEDAI	Left Message on Recorder
Thu Nov 19, 2009	09:13:12	FRANGEDAI	GOOGLE: REV POE: O'Rourke Elementary School 251-221-1585
Thu Nov 19, 2009	09:15:37	FRANGEDAI	Phoned: O'Rourke Elementary School at POE dialed: 2512211585
Thu Nov 19, 2009	09:15:38	FRANGEDAI	Left message to call
Thu Nov 19, 2009	09:28:16	DIALER TH	Phoned: STACI WITHERINGTON at ACRNT At Work dialed: 3343432010
Thu Nov 19, 2009	09:28:16	DIALER TH	Dialer Operator Intercept
Fri Nov 20, 2009	10:33:21	HANSON MI	Phoned: STACI SULLIVAN at Home dialed: 2512595132
Fri Nov 20, 2009	10:33:35	HANSON MI	No Answer, No Message Left
Fri Nov 20, 2009	10:38:04	DIALER TH	Phoned: STACI WITHERINGTON at ACRNT At Work dialed: 3343437111
Fri Nov 20, 2009	10:38:04	DIALER TH	Dialer Operator Intercept
Fri Nov 20, 2009	15:58:56	CAMPBELL	Phoned: O'Rourke Elementary School at POE dialed: 2512211585
Fri Nov 20, 2009	15:58:58	CAMPBELL	Left message to call
Fri Nov 20, 2009	16:47:22	SYSTEM TH	Progressive Search Returned No New Numbers
Tue Nov 24, 2009	15:58:46	DIALER TH	Dialer The New Inbound! ANI: 2515992808
Tue Nov 24, 2009	10:02:25	HANSON MI	Phoned: O'Rourke Elementary School at POE dialed: 2512211585
Tue Nov 24, 2009	10:03:00	HANSON MI	Left message to call
Tue Nov 24, 2009	10:31:49	LAPEY DA	Phoned: STACI SULLIVAN at Home dialed: 2512595132
Tue Nov 24, 2009	10:31:49	LAPEY DA	privacy director > > > >
Tue Nov 24, 2009	10:32:43	LAPEY DA	No Answer, No Message Left
Tue Nov 24, 2009	10:43:20	HANSON MI	Phoned: staci called in at Home dialed: 2515334287

Note Date	Name	Last Name	Note Text
Tue Nov 24, 2009 10:43:25	HANSON MI		Consumer Called Office, ID debt collector
Tue Nov 24, 2009 10:43:25	HANSON MI		I advised of situation says is going through debt relief of Lifeguard financial
Tue Nov 24, 2009 10:43:25	HANSON MI		Result Code fired on: NOV 24 2009. Initial Dunn letter previously sent.
Tue Nov 24, 2009 10:44:55	HANSON MI		I advised bal is due says has been w them 6-9 months I advised nothing has been
Tue Nov 24, 2009 10:45:24	HANSON MI		applied to bal since march asks me to contact spouse 251-599-2808 I okd ecc
Tue Nov 24, 2009 10:48:06	HANSON MI		Phoned: stephen sullivan (spouse) at Cell Phone (Manually Dialed) dated: 251599
Tue Nov 24, 2009 10:48:06	HANSON MI		Left Message on Recorder
Tue Nov 24, 2009 10:48:06	HANSON MI		**request to move to c138
Tue Nov 24, 2009 15:57:14	KANAN DA		Transferred incoming call to Collector CID#
Tue Nov 24, 2009 16:12:00	HANSON MI		Phoned: stephen sullivan (spouse) at Cell Phone (Manually Dialed) dated: 251599
Tue Nov 24, 2009 16:12:05	HANSON MI		Spouse Called Office, ID debt collector
Tue Nov 24, 2009 16:12:05	HANSON MI		says has hired this company and would like for me to spk w them I advised of sit
Tue Nov 24, 2009 16:12:05	HANSON MI		Result Code fired on: NOV 24 2009. Initial Dunn letter previously sent.
Tue Nov 24, 2009 16:12:48	HANSON MI		aulon doesn't seem to be concerned that nothing has been done on the acct since
Tue Nov 24, 2009 16:13:17	HANSON MI		may when they enrolled I okd advised will spk w them from here gv mm ecc
Tue Nov 24, 2009 16:13:41	HANSON MI		Phoned: Lifeguard financial at POA dated: 8883333860
Tue Nov 24, 2009 16:13:45	HANSON MI		TT POA, ID debt collector
Tue Nov 24, 2009 16:13:45	HANSON MI		I advised of acct, he asks what sif is avail I advised at this time there isn't
Tue Nov 24, 2009 16:13:45	HANSON MI		Result Code fired on: NOV 24 2009. Initial Dunn letter previously sent.
Tue Nov 24, 2009 16:14:14	HANSON MI		one says he would be in breach of their contract if he paid a b/f advises if cn
Tue Nov 24, 2009 16:14:58	HANSON MI		s is pursued they would be representing and in the event there was still no settl
Tue Nov 24, 2009 16:15:20	HANSON MI		lement avail they would advise cns to file for banko I okd ecc
Wed Dec 09, 2009 09:21:58	TARMY LI		CLIENT ADDED INTEREST ACCRUED: \$18.15 ON 12-09-2009
Fri Dec 18, 2009 11:00:35	DUNN GR		CLIENT NOTE: INTEREST WAIVER OFFER LETTER SENT
Sat Jan 09, 2010 15:06:38	DUNN GR		CLIENT UPDATED INTEREST ACCRUED: ADDED \$18.76 ON 01-09-2010
Fri Jan 15, 2010 16:31:45	PECTEAU P		SPECIAL DISCOUNT OFFER SENT 80% DUE BY 2/15/2010
Mon Feb 01, 2010 12:18:31	SYSTEM TH		ACCOUNT MOVED DUE TO BEING OUT OF AUDIT
Tue Feb 09, 2010 09:32:41	TARMY LI		CLIENT UPDATED INTEREST ACCRUED: ADDED \$18.76 ON 02-09-2010
Tue Mar 09, 2010 09:39:10	TARMY LI		CLIENT UPDATED INTEREST ACCRUED: ADDED \$18.94 ON 03-09-2010
Sun Mar 14, 2010 15:54:28	DUNN GR		CLIENT NOTE: SEND SOFT RECALL
Sun Mar 14, 2010 15:56:25	DUNN GR		*Keeper Requested (Automatically): Section Debt Relief is an automatic keeper*
Fri Apr 09, 2010 10:30:10	DUNN GR		CLIENT UPDATED INTEREST ACCRUED: ADDED \$18.76 ON 04-09-2010
Sun Apr 18, 2010 22:35:11	DUNN GR		CLIENT NOTE: SEND SOFT RECALL
Sun Apr 18, 2010 22:34:25	DUNN GR		*Keeper Requested (Automatically): Section Debt Relief is an automatic keeper*
Sun May 09, 2010 22:49:06	DUNN GR		CLIENT UPDATED INTEREST ACCRUED: ADDED \$18.15 ON 05-09-2010
Sun May 23, 2010 09:20:44	DUNN GR		CLIENT NOTE: SEND SOFT RECALL
Sun May 23, 2010 09:26:56	DUNN GR		*Keeper Requested (Automatically): Section Debt Relief is an automatic keeper*
Wed Jun 09, 2010 09:57:56	TARMY LI		CLIENT UPDATED INTEREST ACCRUED: ADDED \$18.76 ON 06-09-2010
Mon Jun 28, 2010 11:08:12	DUNN GR		CLIENT NOTE: SEND SOFT RECALL
Mon Jun 28, 2010 11:07:41	DUNN GR		*Keeper Requested (Automatically): Section Debt Relief is an automatic keeper*
Fri Jul 09, 2010 09:57:33	TARMY LI		CLIENT UPDATED INTEREST ACCRUED: ADDED \$18.15 ON 07-09-2010
Sun Aug 01, 2010 16:36:53	DUNN GR		CLIENT NOTE: SEND SOFT RECALL
Sun Aug 01, 2010 16:41:00	DUNN GR		*Keeper Requested (Automatically): Section Debt Relief is an automatic keeper*
Mon Aug 09, 2010 10:30:49	TARMY LI		CLIENT UPDATED INTEREST ACCRUED: ADDED \$18.76 ON 08-09-2010
Sun Sep 05, 2010 10:10:48	DUNN GR		CLIENT NOTE: SEND SOFT RECALL
Sun Sep 05, 2010 10:16:04	DUNN GR		*Keeper Requested (Automatically): Section Debt Relief is an automatic keeper*
Thu Sep 09, 2010 09:19:39	TARMY LI		CLIENT UPDATED INTEREST ACCRUED: ADDED \$18.76 ON 09-09-2010
Tue Sep 14, 2010 14:58:56	AUDITOR01		*** STACI SULLIVAN Debtor record changed by: auditor01
Tue Sep 14, 2010 14:59:36	AUDITOR01		Phoned: Lifeguard financial at POA dated: 8883333860
Tue Sep 14, 2010 14:59:38	AUDITOR01		Phone number is restricted do not call
Tue Sep 14, 2010 14:59:38	AUDITOR01		***PH NUMBER RESTRICTED DUE TO COMPLAINT RCVD- PH NUMBER WAS NOT CALLED***

Transaction	Amount	Date Paid	Date Post	Collector	Reference #
Assigned by Client	2,428.83	11-13-2009	11-13-2009	SYSTEM, THE	NewBiz
Interest Accrued	183.95	12-09-2009	09-09-2010	HOUSE, COLLECT	

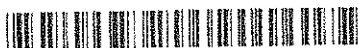
Report Date: Wed 09-15-2010

Debtor Overview Report

Page 4 of 4

Whose Number	Number	Is Contacted	Attempted	Date	Action	Result
Staci (Callie) M	261-553-4287	11/24/2009	11/24/2009	1	Cell Phone Sc	Received Call from Con
Staci Sullivan	261-553-3050	01/01/1901	11/18/2009	3	Cell Phone Sc	Wrong Number
Staci Witherington	334-243-7111	01/01/1901	11/20/2009	1	Cell Phone Sc	Dialer Operator Intercep
Staci Witherington	334-343-8711	01/01/1901	11/19/2009	1	Cell Phone Sc	Dialer Operator Intercep
Lifeway Financial	256-333-3820	11/20/2009	05/14/2010	2	PCA	Number Restricted
Stephen Sullivan (spouse)	261-509-2809	11/24/2009	11/24/2009	2	Cell Phone RM	Received Call from Spo
Steve Sullivan	251-269-0132	01/01/1901	11/24/2009	2	Horns	No Answer, No Messag
O'Rourke Elementary School	251-221-1585	01/01/1901	11/24/2009	1	POE	LMTC
Staci Sullivan	261-340-0155	01/01/1901	11/19/2009	1	Expense Phot	Dialer Operator Intercep

NW 00004



PO Box 1299
Haverhill MA 01831
RETURN SERVICE REQUESTED

Nelson, Watson & Associates, LLC

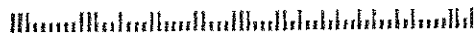
80 Merrimack Street Lower Level
Haverhill, MA 01830
Phone: (888) 350-8455 • Fax: (978) 469-9046

January 18, 2010

Creditor: Capital One Services LLC - CT
Acct #: 454841230
Balance Due: \$2465.74

CAPT10219 - A110 - 4431
Staci D Sullivan
6429 Pinehurst Run
Mobile AL 36608-3855

Nelson, Watson & Associates, LLC
PO Box 1299
Haverhill MA 01831-1799



*** Detach Upper Portion and Return with Payment ***

4431-NWAA2011-TYD0286497

Acct No.: 454841230
Creditor: Capital One Services LLC - CT

Principal: \$2427.62
Interest: \$38.12
Total Balance: \$2465.74

The above referenced account has been placed with this office for collection. Remittance of the payment in full is hereby requested. However, Capital One Services LLC - CT has agreed to accept one single payment in the amount of \$2219.17 as a settlement for less than the full balance owed on this account. FUNDS MUST BE RECEIVED IN MY OFFICE NO LATER THAN THE CLOSE OF BUSINESS FEB 15, 2010. If you are unable to accept this offer, please call our office for alternative payment plans.

We are not obligated to renew this offer. For your security, please make all payments payable to Nelson, Watson & Associates, LLC.

This communication is from a debt collector. This is an attempt to collect a debt. All information obtained will be used for that purpose.

Please call Monday through Thursday 8:30am to 9pm EST, Friday 8:30am to 5pm, or Saturday 9am to 1pm EST.

Sincerely,
Consumer Services Department

Please Note: When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. Funds may be withdrawn from your account as soon as the same day we receive the check and you will not receive your check back from your financial institution.

IF YOU WISH TO PAY BY VISA OR MASTERCARD, (CIRCLE ONE) FILL IN THE INFORMATION BELOW AND RETURN THE ENTIRE LETTER TO US IN THE ENCLOSED ENVELOPE.



\$

Account Number	Payment Amount	Expire Date
Card Holder Name		
Signature of Card Holder		

NW 00005

PO Box 1299
Haverhill MA 01831
RETURN SERVICE REQUESTED

Nelson, Watson & Associates, LLC

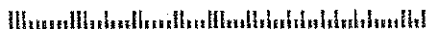
80 Merrimack Street Lower Level
Haverhill, MA 01830
Phone: 888-269-8909 • Fax: (978) 469-9046

November 16, 2009

Creditor: Capital One Services LLC - CT
Acct #: 454841230
Balance Due as of 11/16/09: \$2428.83

CAPT10219 - A20 - 2
Staci D Sullivan
6429 Pinchurst Run
Mobile AL 36608-3855

Nelson, Watson & Associates, LLC
PO Box 1299
Haverhill MA 01831-1799



*** Detach Upper Portion and Return with Payment ***

2-NW_A2002-TYCA234A60

Creditor: Capital One Services LLC - CT
Acct No.: 454841230

Principal: \$2427.62
Interest: \$1.21
Total Balance as of 11/16/09: \$2428.83

The above referenced account has been placed with this office for collection. Remittance of the payment in full is hereby requested.

To obtain your most current balance information, please call our office at 888-269-8909. For your security, please make all payments payable to Nelson, Watson & Associates, LLC.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice this office will provide you with the name and address of the original creditor, if different from the current creditor.

Please call Monday through Thursday 8:30am to 9pm EST, Friday 8:30am to 5pm, or Saturday 9am to 1pm EST.

This communication is from a debt collector. This is an attempt to collect a debt. All information obtained will be used for that purpose.

Sincerely,
Consumer Services Department

Please Note: When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. Funds may be withdrawn from your account as soon as the same day we receive the check and you will not receive your check back from your financial institution.

IF YOU WISH TO PAY BY VISA OR MASTERCARD, (CIRCLE ONE) FILL IN THE INFORMATION BELOW AND RETURN THE ENTIRE LETTER TO US IN THE ENCLOSED ENVELOPE.



\$

1

Account Number

Payment Amount

Expire Date

Card Holder Name

Signature of Card Holder

NW 00006

DEBTOR	DATE NOTIFIED
Katalin Peter v. NWA	1/8/2009
Cristian Mejia v. NWA	1/12/2009
Lori Daugherty v. NWA	1/14/2009
Theresa Atkison v. NWA	1/5/2009
Larry Herring v. NWA	1/28/2009
Findanka Pentcheza v. NWA	2/2/2009
Edward Person v. NWA	2/3/2009
Pavel Mushinsky v. NWA	2/20/2009
Lindsey Grego v. NWA	3/25/2009
Gary Collins v. NWA	4/13/2009
Tiffany Cummings v. NWA	5/6/2009
Maria Sanchez v. NWA	5/8/2009
James Womack v. NWA	6/1/2009
Yerachmiel Hiller v. NWA	7/20/2009
Becca Maccanthail v. NWA	7/31/2009
Angela Bushdiecker v. NWA	8/19/2009
Dale Roof v. NWA	8/26/2009
Debra Rocco v. NWA	9/11/2009
Dennis Weible v. NWA	10/6/2009
Erica Adams v. NWA	9/11/2009
Athanasia Sgouris	9/28/2009
Elisa Spero v. NWA	10/19/2009
William Lawson v. NWA	10/22/2009
Joshua Kaplan v. NWA	12/2/2009
Helena Willis v. NWA	12/1/2009
Mike McDonald v. NWA	10/26/2009
Amir Goldstein v. NWA	10/27/2009
Janie Barthle v. NWA	10/28/2009
Richard Hall v. NWA	11/5/2009
Gail Porter v. NWA	12/10/2009
Amanda Daniel v. NWA	12/3/2009
Andrea Rodgers v. NWA	12/18/2009
Marco Rafala v. NWA	12/11/2009
Teresa Murray v. NWA	12/10/2009
Louis Goldman v. NWA	1/13/2010
Jeff Janicki v. NWA	1/19/2010
Shavia Underwood v. NWA	2/1/2010
Faustino Del Valle v. NWA	1/21/2010
Matt Jenkins v. NWA	1/26/2010
Beverly Lynch v. NWA	2/5/2010
Jesse Doshay v. NWA	2/8/2010
John Maggi v. NWA	5/28/2010
George and Debbie Wood v. NWA	2/12/2010
Shelley Strickland v. NWA	3/9/2010
Leonard Friedman v. NWA	2/19/2010

Rachel Kiefer v. NWA	2/23/2010
Mindi McMains v. NWA	3/19/2010
Pamela Pinchbeck v. NWA	3/16/2010
Joanne Balbarin v. NWA	3/25/2010
Matthew Seibel v. NWA	4/1/2010
Tara Mitchell v. NWA	4/9/2010
Sandra Fillichio v. NWA	4/21/2010
Bruce Lehman v. NWA	5/17/2010
Jacqueline McNeill v. NWA	5/3/2010
Sandra Culbreth v. NWA	4/26/2010
Dragana Zugay v. NWA	4/30/2010
Rachel Stevens v. NWA	5/17/2010
Bessie Martinear v. NWA	6/11/2010
Katheryn Bailey v. NWA	7/13/2010
Claudia Bargiel v. NWA	7/15/2010
Barbara Bisig v. NWA	7/20/2010
Penny Boots v. NWA	8/5/2010
Della Johnson v. NWA	9/7/2010
Amaury Alonso v. NWA	9/7/2010
Miranda Cortez v. NWA	9/9/2010
Staci Sullivan v. NWA	9/16/2010
Janet Mandato v. NWA	9/20/2010
Omar Lado v. NWA	9/28/2010
Darrell Boyer v. NWA	10/20/2010
Colleen Pitner v. NWA	10/25/2010
Raynera Mrotek v. NWA	11/2/2010
Michael Samuels v. NWA	11/19/2010
Alicia Hamlin v. NWA	12/9/2010
Alberta Javosky v. NWA	12/28/2010
Kenneth Peters v. NWA	12/28/2010